COMMENT SET 12

March 7, 2004

California State Lands Commission
Attn: Eric Gillies
100 Howe Ave. Suite 100-south
Sacramento, CA 95825

RE:DEIR 724, SCH#2001021119
PRC-421 Pier Removal Project

Dear Mr. Gillies:

Here are my comments:

Pg.1-1 states that PRC 421 is in a state of severe deterioration. This remnant structure is the remains of a pier built in the early 1930's. **12-1**
In Fig. 1-1 it appears that the underwater column degradation is quite severe due to the presence of concrete voids in the pier columns. Appendix H pg. 1 " The concrete is crumbling and it is easy for the divers to remove (it) by hand. "
The degradation of the circumference listed in Fig.1-1 states:
C1, B1 100% degradation
A1 80%
A3 70%
B3 60%
If the degradation is this severe why aren't this columns not removed in a different manner? a
The report states that mechanical cutting was rejected by the applicant due to the extreme amount of weight of each caisson.I presume this is if the caisson is cut at its base. Was it considered to cut the caissons in fourths? b
If the columns are so deteriorated what is going to happen if you apply explosives to them? Couldn't they pulverize? Aren't you creating more debris? c-e
It seems strange that the same amount of explosives are scheduled to be used on all columns-- four charges under each column;Appendix J, pg.6 . Why is not the degradation of each column being considered? f

How will the well conductor pipe be checked to see if it still has production fluid? **12-2**

Fig.3-7 shows 3 pipes lying near the structure legs on the ocean floor. In Appendix H,pg 5 one can see we have a total of 69 remnants of pilings. Are these cut at sea bed level? Otherwise they could pose danger to swimmers and surfers.All the debris that is currently resting in the sea floor should be removed first before toppling the caissons . **12-3**

The blast effect of the external method could have consequences. **12-4**
The oil line that goes from Platform Holly to Venoco EMT goes trough the middle of PRC 421; the same goes for the seep tent line (see attachment).
Comparing the maps, the one in the DEIR Appendix A,pg.3 is different from the one of the Energy Division briefing for the City of Goleta. Why is this?

What happens if there is a rupture secondary to the detonation?
Has Venoco been asked to shut down operations during the detonation?
After the explosion ,both lines should be checked for damages or leaks. Has this been addressed? **12-5**

We have an idle well on PRC 421 and another one near by. What is going to be the effect on those two? One part of the protective wall of the idle well on PRC 421 collapsed in January 2004. **12-6**

The report states that the only other facilities near the remnant PRC 421 structure are: the Venoco seep line, Ellwood pier, the barge and Platform Holly.Why is the active oil line connecting Holly with the EMT not mentioned in the draft EIR? **12-7**

In a recent tour hosted by the Energy Division I saw that this line ran very close to the seep tent line, at least near the beach where it was exposed to view. Anything happening to this line could result in an oil spill and all its consequences.

I share the concerns of Ms. Horn from the Energy Divison, which were listed to you in her letter of Nov. 6, 2003. **12-8**

On the DEIR,pg. 5-4, it states:"The proposed project would result in increased vessel traffic if the platform Holly re-drill program is conducted at the same time as the proposed project, a cumulative vessel traffic impact would result". I believe the public in the city of Goleta is not aware of any re-drill program by Venoco. This should be more widely known. Please put me on your mailing list regarding this project. **12-9**

The potential release of more hydrocarbons and increased sediment suspension would affect offshore biological resources such as marine mammals, fish, seabirds, seashore birds like the snowy plover, which is listed as occupying critical habitat Appendix J,pg 7. **12-10**

The sound waves from underwater detonations and pile driving can injure or kill wildlife. This is another reason to evaluate alternatives to explosions. **12-11**

The piles that are going to be used for the new roosting site are 30" in diameter
The only test results in the DEIR are for piles that are 12 " in diameter and they were tested in sand, not in 32 feet of water.(Appendix J, pg.11)
In essence the report says that we do not know what type of noise installation would be generated. We need actual data ,not assumptions. **12-12**

The new height of the bird roost is 40 feet above the ocean surface. This is approximately twice the height of the existing roost. If this is for a wave that will, in theory, happen once in 100 years, it is overkill. Why construct an ugly, 40' roost that mars Goleta's coast for birds that will fly away if this wave ever comes?
Has this structure ever been tested? If this is experimental,it is not acceptable. **12-13**

Also, has the piles effect on the gray whale migration been considered? Calves can get stuck between the piles if they are too close together. **12-14**

Appendix M. If you have an emergency the phone number given in the DEIR for the Ca. Office of Emergency Services (805- 568-1207) was disconnected when I called recently. **12-15**

Also all the regulatory agencies listed in the oil spill contingency plan (pg.4) do not have phone numbers or e-mails in case of an emergency. **12-16**

In the case of a spill Mr. Clean II, stationed in Santa Barbara ,can be mobilized within one hour. If you have a large spill, one hour delay can do a lot of damage. **12-17**

Your maps are not accurate. Fig 1-2 does not show the Bacara Resort Hotel, Winchester Commons estates and Mountain View estates. This needs correction. **12-18**

With the introduction of quary rock to create a man -made hard bottom substrate 9 feet above the natural sea bed (4.4-54) and 170 feet long, will this not change sand deposition along Haskell's Beach? **12-19**

Why not remove all the pier pilings and remnants leaving a clean ocean floor and move the site of the roost to Elwood Pier? **12-20**

Sincerely yours,

Inge E. Cox, M.D.

Energy Division Briefing for the City of Goleta

June 3, 2002

Presented by Energy Division Staff:

Steve Chase, Deputy Director
Michelle Pasini, Energy Specialist
Rob Mullane, Planner
Kristen Getler, Planner

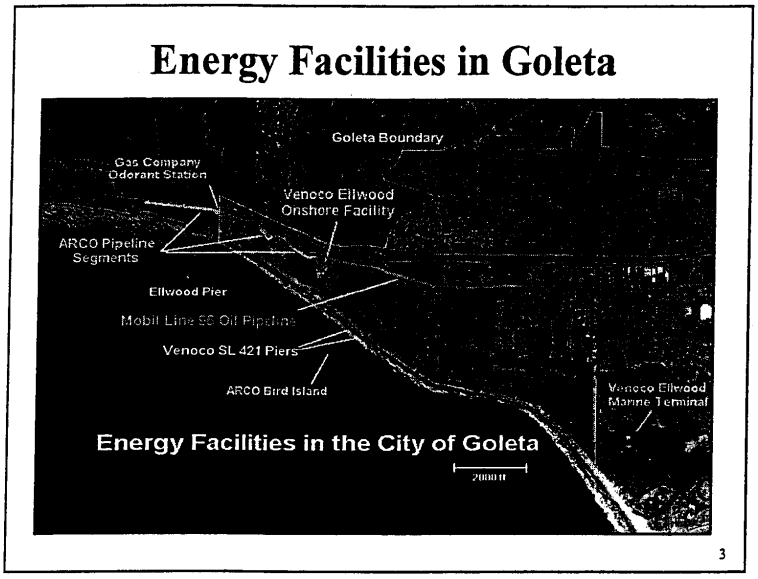
1

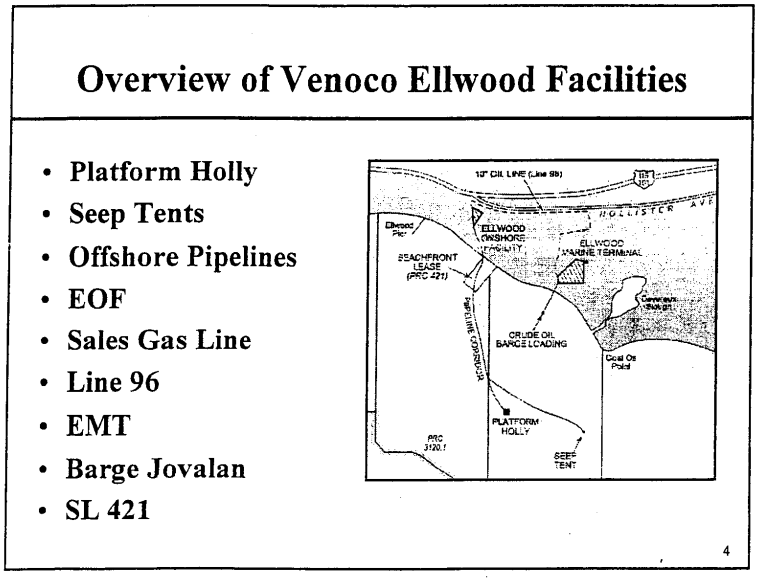
Objective

Provide City Council with Overview of:

- Energy Facilities within City limits
- Pending permits and compliance matters to come before City decision-makers

2


Energy Facilities in Goleta
Goleta Boundary
Gas Company Odorant Station
Venoco Ellwood Onshore Facility
ARCO Pipeline Segments
Ellwood Pier
Mobil Line 96 Oil Pipeline
Venoco SL 421 Piers
ARCO Bird Island
Venoco Ellwood Marine Terminal
Energy Facilities in the City of Goleta
3


Overview of Venoco Ellwood Facilities
• Platform Holly
• Seep Tents
• Offshore Pipelines
• EOF
• Sales Gas Line
• Line 96
• EMT
• Barge Jovalan
• SL 421
12" OIL LINE (Line 96)
HOLLISTER AVE
ELLWOOD ONSHORE FACILITY
ELLWOOD MARINE TERMINAL
BEACHFRONT LEASE (PRC 421)
CRUDE OIL BARGE LOADING
PLATFORM HOLLY
SEEP TENT
4

Commenting Party: Inge Cox, M.D

Date of Comment(s): March 7, 2004

Responses to Comment(s):

12-1a. Following the removal of the topside structure and debris, the caissons will be toppled in place to form the core of an area of hard bottom substrate that will meet the design standards of the California Department of Fish and Game. The deteriorated concrete portions of the caissons will not be disturbed. The caissons are to be toppled by exposing (four feet below the ocean floor) and severing (with shaped explosives located at the base of each caisson) the four steel “H” beams that form the core of each caisson. Please refer to Section 2.1 of Appendix H for a more detailed description of the condition of each of the caissons and Section 3.4.2, Toppling of Existing Caisson Structures at pages 3-19 and 3-21 of the DEIR for additional detail.

12-1b. The Proposed Project will maintain the integrity of the caissons to: 1) reduce the level of impacts to the environment, e.g., the impacts identified in the document would need to be multiplied by the number of additional segments into which each caisson would be divided and such impacts would be more severe as concrete and rebar would have to be cut in the upper portions of each caisson; and 2) provide more stability for the hard bottom substrate than would be afforded by smaller pieces.

12-1c-e. As indicated in Response to Comment 12-1a above, the deteriorated concrete portions of the caissons will not be disturbed.

12-1f. The linear shaped charges are designed by JRC to sever steel of as much as 1.75" thick. It is prudent engineering and planning to go into a demolition job of this nature with the clear understanding a steel member can be easily severed with only one charge whether it is in an "as-new" condition or degraded.

12-2. The well conductor pipe is associated with wells that were abandoned, as indicated and in the manner described in the HAZ-3 Discussion at page 4.5-4 of the DEIR, in 1953 and 1954. There is neither indication nor record of any “leakage” from either of these wells. The conductor pipe associated with Well 10 (under the pier remnant) extends above the level of the ocean with its floor established by the concrete plug in the well, which begins at the sea floor. The proposed operating procedures call for a vacuum hose to be inserted into the top of the conductor pipe to remove whatever substances may be present. Any substance removed will be pumped into a sealed tank on board the Load Line Barge. The conductor pipe associated with Well 7 extends only three feet above the top of the concrete plug, which also begins at the sea floor and extends downward. Therefore, only sea water is present.

12-3. The 69 piling remnants will be cut at or below the mudline as described in Section 3.4.3, Remnant Causeway Piling Removal on page 3-21 of the DEIR. The seafloor will be cleared of all debris prior to the installation of the four pilings and the hard bottom substrate material.

12-4. The closest active pipeline(s) within State Lease PRC-421 pass through the southwest corner, approximately 1,650 feet from the project site. These pipeline(s) then pass to the northwest (in another lease) of the project site approximately 900 feet distant. The Propose Project would use linear shaped charges which are highly specialized "cutting devices" that project the explosive reaction inward along a very narrow line. They are not "shattering devices. Extensive calculations were prepared by JRC Corporation and presented in the application to the State Lands Commission. These calculations indicate a very rapid dropoff in overpressure and therefore not affect thin-hulled project vessels at a distance of only 150 feet. Pressure pipelines that are capable of withstanding substantially more force than experienced by a sea-going vessel will not be affected.

The figure shown in Appendix A of the DEIR appears to show more pipelines than the figure attached to the comment letter. It may be possible that the County did not include the additional lines because they are not associated with Veneco Ellwood Facilities.

12-5. Please refer to the above response.

12-6. As indicated in Response to Comment 12-2, the offshore wells have been abandoned and will not be impacted by the Proposed Project or create any environmental impacts. The nearshore well to which the commentor refers is “shut in”, i.e., an active well that is not being produced, which also will not be affected by the use of the designated charges.

12-7. Please refer to Response to Comment 12-4. In addition, the referenced line is not located within any area to be affected by activities or impacts of the Proposed Project and is not covered by the DEIR for these reasons.

12-8. The issues addressed by Ms. Horn of the Energy Division, County of Santa Barbara, are covered in Sections 4.4, 4.7, 4.6, and 4.5 of the DEIR respectively.

12-9. The Platform Holly Redrill Project was approved by the CSLC in September 2001 and modified by the Commission in August 2003 based on a Mitigated Negative Declaration that was prepared and circulated for public review pursuant to the CEQA.

12-10. As indicated in Response to Comment 12-2 above, there have been no hydrocarbon releases to date from the abandoned wells and the Proposed Project will not affect such wells. The only sources of potential hydrocarbon spills

are limited to project vessels and on-board equipment during pier removal activities. This potential is discussed in BIO-3 beginning at page 4.4-48 of the DEIR.

The DEIR, in BIO-2 at page 4.4-47, discusses the potential impacts of suspended sediments on biological resources and concludes that, "By following the protective measures outlined in the *Wildlife Protection Plan* (Appendix J), the impacts of the Proposed Project are considered not to be significant."

12-11. The impact of noise on marine wildlife is evaluated in BIO-1 on pages 4.4-40 to 4.4-47 of the DEIR. Although the analysis concludes, based on the noted discussion, that "the impact of the Proposed Project is not considered to be significant with additional precautions specified on page 4.4-47.

12-12. Appendix J of the DEIR, *Wildlife Protection Plan*, states that there is no directly comparable noise measurement data that can be applied to the pile driving proposed in association with the Proposed Project. However, the *Wildlife Protection Plan* provides for the gradual ramping up of the pile driving operation to provide warning to marine wildlife. Section 4.11, Monitoring Pile Driving Operations, specifies the nature and extent of the sound monitoring required and provides for the modification of the initially designated hazard zone accordingly.

12-13. The aesthetic impact of the Proposed Project is evaluated in Section 4.7, Aesthetics, of the DEIR. The platforms were designed to be above the predicted crest of the 100-year wave as a prudent engineering measure, as described in Section 3.4.5, Bird Roosting/Nesting Platform Construction of the DEIR. The use of 100-year conditions is required by many codes, such as the American Petroleum Institute (API), American Bureau of Shipping (ABS), etc. A shorter structure would not be as transparent to the waves since the platforms would then be within the wave regime themselves. This would dramatically increase the forces on the pile, and may render the minimalist structures infeasible. Please refer also to Figure 4.7.3 following page 4.7-16 of the DEIR for a visual comparison of the existing and proposed structures.

12-14. Gray whale migration has been considered and the Proposed Project has been designed accordingly, specifically, "The project will be timed to avoid the California gray whale migration (November 30th to June 1st)." See page 4.4-44 of the DEIR. We are not aware of hazards to whales associated with piles being placed too close together on a subsea structure. This project consists of four widely spaced (perhaps 50 feet or more) piles.

12-15. The phone number for the California Office of Emergency Services (OES) provided in Appendix M will be corrected in the ARCO Oil Spill Contingency Plan. OES headquarters indicates they have consolidated and the Los Alamitos telephone contact: (562) 795-2900 should now be used.

12-16. Essential phone numbers of those parties that are to be contacted are provided on page 2 of the Oil Spill Contingency Plan, including those of the OES (State) and the National Response Center (federal). These entities are charged with notifying other related State or federal agencies.

12-17. Please refer to Responses to Comment 12-2 and 12-10. As described in Appendix M, the Proposed Project includes an on-site response capability that would "provide immediate response to large spills". However, in the unlikely event of such a spill, this capability would be employed until Clean Seas arrival.

12-18. Figure 1-2 is a regional and site location map and is not intended to show the land uses of the project area, but rather the general location of the project site. Figure 1-3 is an aerial photo of the project site which shows project area land uses, such land uses are identified and described in the impact assessment sections as appropriate, e.g., Section 4.6, Noise, and 4.7, Aesthetics of the DEIR.

12-19. GEO-7 on page 4.1-14 of the DEIR evaluates the changes in nearshore sediment drift and beaches. The evaluation concludes that no significant impact to beaches would result from the Proposed Project.

12-20. Please see the discussion of the project background in Section 2.1, which describes the Project's history.